

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590



REPLY TO THE ATTENTION OF

JUL 0 9 2001

Mr. Merom Brachman Yenkin Majestic Industries/ Ohio Polychemical 1920 Leonard Columbus, Ohio 43219

Dear Mr. Brachman:

We received your letter faxed on June 26, 2001, regarding your assertion that certain Chemical Recovery Systems (CRS) records regarding Yenkin Majestic (a copy of which U.S. EPA had previously sent to you) were in error. You maintained that the CRS records must be wrong where they refer to a shipment from Yenkin Majestic as containing "6,000 drums." You pointed out that other shipments recorded in the same records contained "6,000 gallons" and you argued that a CRS employee must have erred by typing "drums" rather than "gallons."

We looked at your letter, consulted the records, discussed this and decided that we agree with you that an error in typing by the CRS employee is the most likely explanation for this anomalous entry. There are many reasons why this is most likely. Very few shipments recorded in those lists exceeded 80 drums, and even then were only a few drums over, as for example, 81 or 86. The only exception I am aware of, a shipment of 200 drums, may also be explained by special circumstances I do not intend to discuss in this letter.

In general, where these "dirty inventory lists" prepared by CRS are concerned, shipments with a quantity in thousands refers to gallons; where the quantity is in tens of thousands the reference is usually to pounds, when in single or double digits the unit referenced is usually drums; shipments of more than a hundred and less than a thousand commonly refer to pails. As you note, other shipments by the company you represent are recorded as "6,000 gallons." I will try to ensure that any volumetric ranking of contributions to this site does not overstate Yenkin Majestic's contribution on the basis of an entry which we agree should refer to 6,000 gallons.

Sincerely

Thomas C. Nash

Associate Regional Counsel

Em Clark

cc:Deena Sheppard-Johnson